



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
CARIBBEAN ENVIRONMENTAL PROTECTION DIVISION
CENTRO EUROPA BUILDING, SUITE 417
1492 PONCE DE LEON AVENUE, STOP 22
SAN JUAN, PR 00907-4127

JAN 19 2011

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Mr. José Capeles
Executive Director
Compliance and Quality Control
Puerto Rico Aqueduct and Sewer Authority
P.O. Box 7066
San Juan, Puerto Rico 00916-9990

**Re: Reconnaissance Inspection
Guánica Wastewater Treatment Plant
NPDES Permit Number PR0020486**

Dear Mr. Capeles:

On December 1, 2011, the United States Environmental Protection Agency ("EPA"), Caribbean Environmental Protection Division ("CEPD") office conducted a Reconnaissance Inspection (RI) at the above referenced Puerto Rico Aqueduct and Sewer Authority's (PRASA) facility. The inspection was conducted pursuant the authority contained in Section 308 of the Clean Water Act, 33 U.S.C. § 1251 et seq., 40 CFR § 122.41(a)(2), & 1, 2, 3, and in accordance with Agency wide acceptable guidance and procedures.

The purpose of the RI was to evaluate compliance with the National Pollutant Discharge Elimination System ("NPDES") program. Within forty-five (45) calendar days of receipt of this letter, please respond with the actions PRASA has taken or will take to address the deficiencies included in the attached Water Compliance Inspection Report.

Should you have any questions or comments on the above, please contact Mr. Miguel A. Batista, Environmental Scientist, at (787) 977-5823.

Cordially,



Jaime Géliga,
Chief
Municipal Water Program Branch
Caribbean Environmental Protection Division

Enclosure

cc. Roberto Ayala, EQB
Juan Perez, PRASA
Juan Rodríguez, PRASA-South Region

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United States Environmental Protection Agency
Washington, D.C. 20460
Water Compliance Inspection Report

Form Approved.
OMB No. 2040-0057
Approval expires 8-31-98

Section A: National Data System Coding (i.e., PCS)

Transaction Code	NPDES	yr/mo/day	Inspection Type	Inspector	Fac Type
1 N 2 5 3 P R 0 0 2 0 4 8 6 11 12 1 1 1 2 0 1 17 18 R 19 R 20 1					
Remarks					
2					
Inspection Work Days Facility Self-Monitoring Evaluation Rating B1 QA -----Reserved-----					
6 2 0 69 70 1 71 72 73 74 75 80					

Section B: Facility Data

Name and Location of Facility Inspected (for industrial users discharging to POTW, also include name and NPDES permit number)	Entry Time/Date	Permit Effective Date
GUÁNICA WASTEWATER TREATMENT PLANT YAGUER ST. Guánica, P.R. 00653	9:10 am 12/01/2011	10/01/04
	Exit Time/Date	Permit Expiration Date
	11:00 am 12/01/2011	09/30/09
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)	Other Facility Data	
787-821-2865 See attached report for on-site representative		
Name, Address of Responsible Official/Title/Phone and Fax Number(s)		
Julio V. Pérez, Executive Regional Director PRASA South Region		
Contacted <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		

Section C: Areas Evaluated During Inspection (Check only those areas evaluated)

<input type="checkbox"/> Permit	<input type="checkbox"/> Flow Measurement	<input checked="" type="checkbox"/> Operations & Maintenance	<input type="checkbox"/> CSO/SSO (Sewer Overflow)
<input type="checkbox"/> Records/Reports	<input type="checkbox"/> Self-Monitoring Program	<input type="checkbox"/> Sludge Handling/Disposal	<input type="checkbox"/> Pollution Prevention
<input checked="" type="checkbox"/> Facility Site Review	<input type="checkbox"/> Compliance Schedules	<input type="checkbox"/> Pretreatment	<input type="checkbox"/> Multimedia
<input checked="" type="checkbox"/> Effluent/Receiving Water	<input type="checkbox"/> Laboratory	<input type="checkbox"/> Storm Water	<input type="checkbox"/> Other: Pump Stations

Section D: Summary of Findings/Comments (Attach additional sheets of narrative and checklists as necessary)

See attached report for findings.

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Phone and Fax Numbers	Date
 Miguel A. Batista, Environmental Scientist	CEPD-MWPB (787) 977-5823 (ph) ; (787) 289-7104 (fax)	01/17/2012
Signature of Management QA Reviewer	Agency/Office/Phone and Fax Numbers	Date
 Jaime A. Geliga, Chief Municipal Water Programs Branch	CEPD-MWPB (787) 977-5840 (ph) ; (787) 289-7104 (fax)	1/19/12

Summary of Findings/Comments
Water Compliance Inspection Report Form
(EPA Form 3560-3)

RECONNAISSANCE INSPECTION

Facility Name: Guánica WWTP
NPDES Permit Number: PR0020486
PRASA Representatives: Amalio Quirós, Plant Operator

I. BACKGROUND

A Reconnaissance Inspection (RI) was conducted on December 1, 2011 at the Guánica WWTP. The RI consisted of an opening interview to discuss the purpose of the inspection and to request information about the facility. A walk through the plant was performed to evaluate its operational conditions. Also, a grab sample of the effluent was collected to evaluate the appearance of the discharge at the time of the inspection.

II. PLANT OPERATION AND MAINTENANCE

The Guánica WWTP consists of two treatment modules. One module is a 0.5 MGD activated sludge conventional package plant (Old Plant) and the second module is a 1.25 MGD Biological Nutrient Removal (BNR) treatment plant (New Plant). At the time of the inspection the BNR module was not in operation. Sandblasting was being performed to the corroded walls of the module and to correct the leaks of the secondary clarifiers.

At the time of the inspection, Mr. Amalio Quirós was acting as Plant Operator for the Guánica WWTP. Mr. Quirós has obtained the certification as a Wastewater Treatment Plant Operator Level IV # 2099 which expires on April 22, 2014.

III. FACILITY SITE REVIEW

A. During our previous inspection performed on June 13, 2011, EPA found some equipment out of service. The following table summarizes the findings from our previous inspection, and the actions taken by PRASA to correct them as well as the findings from the December 1, 2011 inspection.

Findings during the June 13, 2011 CEI		Findings during the December 1, 2011 RI
1.	Pista grit removal # 2 was out of service.	Corrected on June 16, 2011. It was documented in both the Operator's Log Book and the Form AAA-340-A # 15527.
2.	The clarifier had moderate accumulation of filamentous organisms over its surface.	This finding was observed at the time of the RI.
3.	Some solid accumulation was observed at the clarifier's center column.	This finding was observed at the time of the RI.
4.	The air piping has had several air leaks for more than a year.	This finding was observed at the time of the RI.
5.	The chlorine detector located outside the chlorine room did not work when a chlorine leak was simulated.	At the time of the RI, the chlorine detector located outside did work when a chlorine leak was simulated.
6.	The chlorine detector located inside the chlorine room did work when a chlorine leak was simulated.	This unit was eliminated.
7.	Blower control panel (MCC) was out of service. Form AAA-340-A # 15526 was completed on May 24, 2011.	Corrected on June 22, 2011. It was documented in both the Operator's Log Book and the Form AAA-340-A # 15526.
8.	The general information display of temperature, oil pressure and hours of operation for the emergency generator has been out of service since at least July 8, 2010.	This finding was observed at the time of the RI.
9.	55-gallon bins containing the polymer use at the Sludge Belt Filter Press are still without secondary containment.	There were two (2) 55-gallon bins holding polymer product placed in a secondary containment system. A third 55-gallon container apparently holding polymer product, was unlabeled and without secondary containment system. In an e-mail sent by Jaime A. Geliga, Chief of the Municipal Water Programs Branch, on June 18, 2009 to PRASA's Compliance Division and all Regions, it was stated that this practice must be stopped at once. We will initiate referrals to other areas of EPA so proper actions are taken if this situation continues.

B. Equipment and/or treatment units identified in poor operational conditions or not in service at the time of the RI:

1. The influent auto-sampler hose needs to be replaced.
2. The scum collector pit was clogged at least since November 13, 2011. According to the

operator, it has not been unclogged because this unit has no SAP number assigned. This situation is not acceptable and must be avoided.

3. Short-circuiting was observed at the “V-type” effluent weirs of the clarifier.
4. The three (3) chlorine contact chambers were in use because of a non-compliance event with Enterococci for the last three (3) months.
5. Housekeeping practices must be improved.
6. The sludge belt filter press was not in service.
7. The calibration for the chart recorder expired in November/2011.
8. Forms AAA-340-A were completed for the following equipments:

Date	AAA-340-A Number	Unit/Equipment
10/03/2011	15552	Blower # 1
09/14/2011	15547	Transfer Switch
11/13/2011	-----	Degritter # 1
08/17/2011	15541	Sludge Belt Filter Press
02/03/2011	24245	Blower # 2
10/09/2011	15556	Blowers Filter (Old Plant)
08/14/2011	15538	Exterior Illumination

IV. EFFLUENT QUALITY

A grab sample of the effluent was taken by the operator at the sampling point 001 for appearance purposes, revealing that it was visibly clear and had no solids: (please indicate if present)

color – No.
grease – No.
oil sheen – No.
turbidity* - No.

visible foam – No.
visible floatable solids – No.
other – N/A.

* Based on observations, it's not a quantitative measure.

V. CONCLUSION

Please note that Part C.5 of Attachment I of the permit requires the permittee to properly operate and maintain all facilities and systems for collection and treatment (and related appurtenances) which are installed or used to achieve compliance.